

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Laurel Elizabeth Kuehn  
**Debtor 1**

Flagstar Bank  
**Movant(s)**

v.

Laurel Elizabeth Kuehn

**Respondent(s)**

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:19-BK-03721-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 36

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Laurel Elizabeth Kuehn, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
7. Upon information and belief, the averment as stated in Paragraph 7 is admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
8. Paragraph 8 contains a conclusion of law to which no response is required.
9. Paragraph 9 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: March 3, 2022

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207  
2132 Market Street  
Camp Hill, PA 17011  
(717) 975-9446  
pmurphy@dplglaw.com  
*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, March 3, 2022, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Rebecca Solarz, Esquire  
KML Law Group, PC  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
*Counsel for Movant(s)*

Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire